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Exhibits: 1-16

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MAURA O'NEILL, as administrator of the Estate of
Madelyn E. Linsenmeir,

Plaintiff,

vs.

CA No. 3:20-cv-30036

CITY OF SPRINGFIELD, MOISES ZANAZANIAN,
REMINGTON McNABB, SHEILA RODRIGUEZ, HAMPDEN
COUNTY SHERIFF'S DEPARTMENT, and JOHN/JANE DOES
NOS. 1-5,

Defendants.

REMOTE and IN-PERSON DEPOSITION OF
MOISES ZANAZANIAN

Thursday, March 17, 2022, 10:06 a.m.

Via Zoom Video Conference

Goulston & Storrs
400 Atlantic Avenue
Boston, Massachusetts 02110

----Reporter: Kathleen L. Good, CSR, RPR----
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Swampscott, Massachusetts 01907
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1 A. There was no gesture. I don't see it.

2 Q. (By Mr. Looney) I can replay it.

3 MR. DAY: Josh, this is Tom Day.

4 Am I supposed to be seeing 7:32:38 on
5 my screen, because I'm not? Or 7:38:32? I'm
6 seeing 7:38:36 and it's frozen.

7 MR. LOONEY: I'm going to move back
8 to 7:38:32.

9 MR. DAY: I just wanted to make sure
10 I wasn't frozen.

11 MR. LOONEY: Let me replay this.

12 (Video played.)

13 Q. Did you make a motion with your
14 hands?

15 A. No.

16 MR. LOONEY: I can replay it again.

17 MR. VIGLIOTTI: He's answered the
18 question.

19 MR. DAY: Could you let it play.

20 MR. LOONEY: I'll go back a little
21 farther to 7:38:26.

22 Q. I would like to direct your
23 attention to what you're doing in this video.

24 (Video played.)

1 Q. Did you raise your finger toward
2 Officer McNabb?

3 A. There was a raised finger, yeah.

4 Q. Why did you raise your finger like
5 that?

6 MR. VIGLIOTTI: Objection.

7 A. I have no idea.

8 Q. (By Mr. Looney) Were you instructing
9 Officer McNabb to not activate the audio
10 recording?

11 A. No.

12 MR. VIGLIOTTI: Could you let it play
13 one more time. I want to see it again.

14 MR. LOONEY: Sure. I'm going back to
15 7:38:28.

16 (Video played.)

17 MR. DAY: Could you play it at
18 regular speed? Was that regular speed?

19 MR. LOONEY: That's regular speed.

20 A. I don't recall. I still don't recall.

21 Q. This is the video you reviewed prior
22 to this deposition?

23 A. Yes.

24 MR. LOONEY: I would like to go now

1 CERTIFICATE OF COURT REPORTER

2 I, Kathleen L. Good, Certified Shorthand
3 Reporter and Registered Professional Reporter, do
4 certify that the deposition of MOISES ZANAZANIAN, in
5 the matter of O'Neill vs. City of Springfield , on
6 March 17, 2022, was stenographically recorded by me;
7 that the witness appeared before me via
8 videoconference and provided satisfactory evidence
9 of identification, as prescribed by Executive Order
10 455 (03-13) issued by the Governor of the
11 Commonwealth of Massachusetts, before being sworn by
12 me, a Notary Public in and for the Commonwealth of
13 Massachusetts; that the transcript produced by me is
14 a true and accurate record of the proceedings to the
15 best of my ability; that I am neither counsel for,
16 related to, nor employed by any of the parties to
17 the above action; and further that I am not a
18 relative or employee of any attorney or counsel
19 employed by the parties thereto, nor financially or
20 otherwise interested in the outcome of the action.

21 *Kathleen L. Good*

22 _____
23 Kathleen L. Good, CSR, RPR
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